

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 17-152

v. * SECTION: "F"

PAMELA THOMPSON *

* * *

FACTUAL BASIS

Should this matter have proceeded to trial, the government would have proven, through the introduction of competent testimony and admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant.

The government would establish that Social Security was a social insurance program that provided eligible applicants with retirement, disability, and survivor benefits. The Social Security Administration ("SSA") was a government agency responsible for the management of the Social Security program, as defined in the Social Security Act.

The government would establish that the case against **PAMELA THOMPSON** ("**THOMPSON**") began as a result of a complaint to the SSA's Office of the Inspector General ("**OIG**") from the SSA's District Office located in Terrytown, Louisiana. SSA-OIG was advised by the District Office that during a review of the Medicare Non-Utilization Project it was

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AUSA 
Defendant 
Defense Counsel 

discovered that SSA Beneficiary Carrie Thompson had died on November 3, 2008, but continued to receive SSA benefits for the past nine years.

SSA-OIG determined that Carrie Thompson's SSA monthly benefits of \$2,973.20 were deposited directly into her Capital One Bank account. Capital One bank records revealed that Carrie Thompson's daughter, Pamela Thompson, had access to her mother's account. According to Capital One and SSA records, Thompson received \$297,325.70 in SSA benefits that were intended for her mother, Carrie.

On May 1, 2017, SSA-OIG and a Louisiana State Police Investigator interviewed Thompson at her residence in New Orleans. Thompson executed a written *Miranda* rights waiver and agreed to speak with the agents. During the interview, the defendant admitted she was Carrie Thompson's daughter and she took care of her mother through home health care. Thompson said she paid her mother's home health care bills. Thompson claimed that she didn't know she was not entitled to her mother's SSA benefits after her mother passed away. She said she received mail from the SSA but did not open her mother's mail from the SSA. Thompson admitted to using her mother's SSA benefits to pay for her own personal living expenses.

Thompson was shown cancelled checks that she admitted to writing and endorsing. In addition, Thompson said she and her mother were joint account holders of the account in which her mother's SSA benefits were deposited. Thompson also admitted that she viewed the account online and knew that the SSA had been direct depositing her mother's SSA benefits into the Capital One checking account.

Various records and testimonial evidence, including testimony from representatives of the SSA-OIG, Louisiana State Police, a representative from Capital One Bank, and other witnesses would also be admitted to prove the facts set forth above.



BRIAN M. KLEBBA
Assistant United States Attorney

11/15/17
Date



PAMELA THOMPSON
Defendant

11-15-17-
Date



ROBERT JENKINS
Counsel for Defendant

11-15-17-
Date